

030-21241

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NRC FORM 312
(1-84)
10 CFR 30, 32, 33, 34,
35 and 40

APPLICATION FOR MATERIAL LICENSE

U.S. NUCLEAR REGULATORY COMMISSION
APPROVED BY OMB
3150-0120
Expires: 5-31-87

03121

INSTRUCTIONS: SEE THE APPROPRIATE LICENSE APPLICATION GUIDE FOR DETAILED INSTRUCTIONS FOR COMPLETING APPLICATION. SEND TWO COPIES OF THE ENTIRE COMPLETED APPLICATION TO THE NRC OFFICE SPECIFIED BELOW.

FEDERAL AGENCIES FILE APPLICATIONS WITH:

U.S. NUCLEAR REGULATORY COMMISSION
DIVISION OF FUEL CYCLE AND MATERIAL SAFETY, NMSS
WASHINGTON, DC 20555

ALL OTHER PERSONS FILE APPLICATIONS AS FOLLOWS, IF YOU ARE LOCATED IN:

CONNECTICUT, DELAWARE, DISTRICT OF COLUMBIA, MAINE, MARYLAND, MASSACHUSETTS, NEW JERSEY, NEW YORK, PENNSYLVANIA, RHODE ISLAND, OR VERMONT, SEND APPLICATIONS TO:

U.S. NUCLEAR REGULATORY COMMISSION, REGION I
NUCLEAR MATERIAL SECTION 8
631 PARK AVENUE
KING OF PRUSSIA, PA 19406

ALABAMA, FLORIDA, GEORGIA, KENTUCKY, MISSISSIPPI, NORTH CAROLINA, PUERTO RICO, SOUTH CAROLINA, TENNESSEE, VIRGINIA, VIRGIN ISLANDS, OR WEST VIRGINIA, SEND APPLICATIONS TO:

U.S. NUCLEAR REGULATORY COMMISSION, REGION II
MATERIAL RADIATION PROTECTION SECTION
101 MARIETTA STREET, SUITE 2900
ATLANTA, GA 30323

IF YOU ARE LOCATED IN:

ILLINOIS, INDIANA, IOWA, MICHIGAN, MINNESOTA, MISSOURI, OHIO, OR WISCONSIN, SEND APPLICATIONS TO:

U.S. NUCLEAR REGULATORY COMMISSION, REGION III
MATERIALS LICENSING SECTION
799 ROOSEVELT ROAD
GLEN ELLYN, IL 60137

ARKANSAS, COLORADO, IDAHO, KANSAS, LOUISIANA, MONTANA, NEBRASKA, NEW MEXICO, NORTH DAKOTA, OKLAHOMA, SOUTH DAKOTA, TEXAS, UTAH, OR WYOMING, SEND APPLICATIONS TO:

U.S. NUCLEAR REGULATORY COMMISSION, REGION IV
MATERIAL RADIATION PROTECTION SECTION
611 RYAN PLAZA DRIVE, SUITE 1000
ARLINGTON, TX 76011

ALASKA, ARIZONA, CALIFORNIA, HAWAII, NEVADA, OREGON, WASHINGTON, AND U.S. TERRITORIES AND POSSESSIONS IN THE PACIFIC, SEND APPLICATIONS TO:

U.S. NUCLEAR REGULATORY COMMISSION, REGION V
MATERIAL RADIATION PROTECTION SECTION
1450 MARIA LANE, SUITE 210
WALNUT CREEK, CA 94596

PERSONS LOCATED IN AGREEMENT STATES SEND APPLICATIONS TO THE U.S. NUCLEAR REGULATORY COMMISSION ONLY IF THEY WISH TO POSSESS AND USE LICENSED MATERIAL IN STATES SUBJECT TO U.S. NUCLEAR REGULATORY COMMISSION JURISDICTION.

1. THIS IS AN APPLICATION FOR (Check appropriate item)

- ☒ A. NEW LICENSE
☐ B. AMENDMENT TO LICENSE NUMBER _____
☐ C. RENEWAL OF LICENSE NUMBER _____

2. NAME AND MAILING ADDRESS OF APPLICANT (Include Zip Code)

Commercial Roof Menders, Inc.
Box 59202
Philadelphia, Pa. 19102

3. ADDRESS(ES) WHERE LICENSED MATERIAL WILL BE USED OR POSSESSED.

At 254 Chester Pike, Ridley Park, Pa. and at temporary job sites throughout the U.S. where the U.S. Nuclear Regulatory Commission maintains jurisdiction over the use of by-product material.

4. NAME OF PERSON TO BE CONTACTED ABOUT THIS APPLICATION

M.R. Cunningham

TELEPHONE NUMBER

(215) 985-4116

SUBMIT ITEMS 5 THROUGH 11 ON 8 1/2 x 11" PAPER. THE TYPE AND SCOPE OF INFORMATION TO BE PROVIDED IS DESCRIBED IN THE LICENSE APPLICATION GUIDE.

5. RADIOACTIVE MATERIAL

a. Element and mass number, b. chemical and/or physical form, and c. maximum amount which will be possessed at any one time.

6. PURPOSE(S) FOR WHICH LICENSED MATERIAL WILL BE USED.

7. INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING AND EXPERIENCE.

8. TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS.

9. FACILITIES AND EQUIPMENT.

10. RADIATION SAFETY PROGRAM.

11. WASTE MANAGEMENT.

12. LICENSEE FEES (See 10 CFR 170 and Section 170.31)

FEE CATEGORY 3P AMOUNT ENCLOSED \$ 230

13. CERTIFICATION. (Must be completed by applicant) THE APPLICANT UNDERSTANDS THAT ALL STATEMENTS AND REPRESENTATIONS MADE IN THIS APPLICATION ARE BINDING UPON THE APPLICANT.

THE APPLICANT AND ANY OFFICIAL EXECUTING THIS CERTIFICATION ON BEHALF OF THE APPLICANT, NAMED IN ITEM 2, CERTIFY THAT THIS APPLICATION IS PREPARED IN CONFORMITY WITH TITLE 10, CODE OF FEDERAL REGULATIONS, PARTS 30, 32, 33, 34, 35, AND 40 AND THAT ALL INFORMATION CONTAINED HEREIN, IS TRUE AND CORRECT TO THE BEST OF THEIR KNOWLEDGE AND BELIEF.

WARNING: 18 U.S.C. SECTION 1001 ACT OF JUNE 25, 1948, 62 STAT. 749 MAKES IT A CRIMINAL OFFENSE TO MAKE A WILLFULLY FALSE STATEMENT OR REPRESENTATION TO ANY DEPARTMENT OR AGENCY OF THE UNITED STATES AS TO ANY MATTER WITHIN ITS JURISDICTION.

SIGNATURE—CERTIFYING OFFICER

TYPED/PRINTED NAME

TITLE

DATE

M.R. Cunningham

M.R. CUNNINGHAM

Pres.

4/8/85

14. VOLUNTARY ECONOMIC DATA

a. ANNUAL RECEIPTS

<\$250K	\$1M-3.5M
\$250K-500K	\$3.5M-7M
\$500K-750K	\$7M-10M
\$750K-1M	>\$10M

b. NUMBER OF EMPLOYEES (Total for entire facility excluding outside contractors)

c. NUMBER OF BEDS

d. WOULD YOU BE WILLING TO FURNISH COST INFORMATION (Dollar and/or staff hours) ON THE ECONOMIC IMPACT OF CURRENT NRC REGULATIONS OR ANY FUTURE PROPOSED NRC REGULATIONS THAT MAY AFFECT YOU? (NRC regulations permit it to protect confidential commercial or financial—proprietary—information furnished to the agency in confidence)

☐ YES

☐ NO

FOR NRC USE ONLY

TYPE OF FEE

FEE LOG

FEE CATEGORY

COMMENTS

APPL.

APR. 7I

3P

AMOUNT RECEIVED

CHECK NUMBER

#230

154

OFFICIAL RECORD COPY

ML10

03661

APR 10 1985

APPROVED BY

DATE

Francis Brown

4/19/85

8505300682 850503
REG. LIC. 30
37-20833-01

PDR

PRIVACY ACT STATEMENT

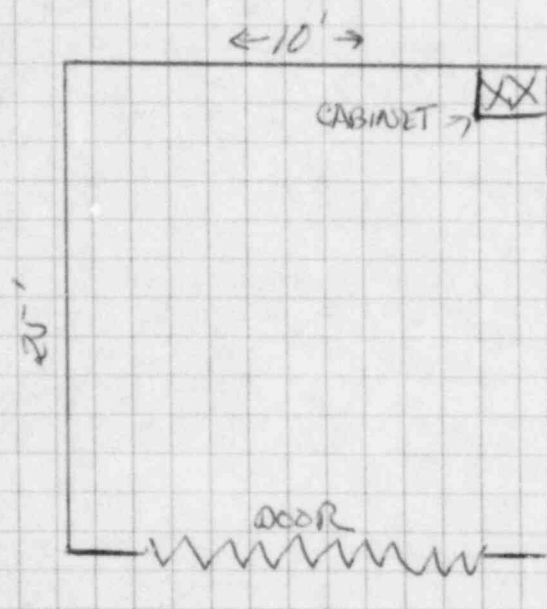
Pursuant to 5 U.S.C. 552a(e)(3), enacted into law by section 3 of the Privacy Act of 1974 (Public Law 93-579), the following statement is furnished to individuals who supply information to the Nuclear Regulatory Commission on NRC Form 313. This information is maintained in a system of records designated as NRC-3 and described at 40 Federal Register 45334 (October 1, 1975).

1. **AUTHORITY:** Sections 81 and 161(b) of the Atomic Energy Act of 1954, as amended (42 U.S.C. 2111 and 2201(b)).
2. **PRINCIPAL PURPOSE(S):** The information is evaluated by the NRC staff pursuant to the criteria set forth in 10 CFR Parts 30, 32, 33, 34, 35 and 40 to determine whether the application meets the requirements of the Atomic Energy Act of 1954, as amended, and the Commission's regulations, for the issuance of a radioactive material license or amendment thereof.
3. **ROUTINE USES:** The information may be (a) provided to State health departments for their information and use; and (b) provided to Federal, State, and local health officials and other persons in the event of incident or exposure, for their information, investigation, and protection of the public health and safety. The information may also be disclosed to appropriate Federal, State, and local agencies in the event that the information indicates a violation or potential violation of law and in the course of an administrative or judicial proceeding. In addition, this information may be transferred to an appropriate Federal, State, or local agency to the extent relevant and necessary for an NRC decision or to an appropriate Federal agency to the extent relevant and necessary for that agency's decision about you.
4. **WHETHER DISCLOSURE IS MANDATORY OR VOLUNTARY AND EFFECT ON INDIVIDUAL OF NOT PROVIDING INFORMATION:** Disclosure of the requested information is voluntary. If the requested information is not furnished, however, the application for radioactive material license, or amendment thereof, will not be processed. A request that information be held from public inspection must be in accordance with the provisions of 10 CFR 2.790. Withholding from public inspection shall not affect the right, if any, of persons properly and directly concerned need to inspect the document.
5. **SYSTEM MANAGER(S) AND ADDRESS:** U.S. Nuclear Regulatory Commission
Director, Division of Fuel Cycle and Material Safety
Office of Nuclear Material Safety and Safeguards
Washington, D.C. 20555

Attachment:

- | | a. | b. | c. | d. |
|----|-------------|-----------------|----------------------|--|
| | Radionuclei | Form | Troxler Drawing
| Maximum
Amount |
| 5. | Am-241:Be | Special
Form | A-102451 | Not to
exceed
44 mCi per
source |
6. To be used in Troxler Model 3216/3218 Roof Moisture Gauge.
7. M.R. Cunningham
8. See attachment entitled Radiation Safety Program.
9. See enclosed diagram.
10. See attachment entitled Radiation Safety Program.
11. Disposal of radioactive material will be either transferred to another licensed user, a licensed burial ground or back to the manufacturer.

9. MATERIAL WILL BE STORED AT A SELF-STORAGE PARK. OUTSIDE DOOR WILL BE PADLOCKED. EQUIPMENT WILL BE PLACED INSIDE LOCKED CABINET WITH WARNING SIGNS.



RADIATION SAFETY PROGRAM
For
Commercial Roof Menders

I. Radiation Safety Officer.

A. M.R. Cunningham is the company Radiation Safety Officer and will assume the following duties:

1. To ensure all terms and conditions of the license are correct and current.
2. To perform required leak tests on schedule and in the correct manner as prescribed by the equipment manufacturer.
3. To maintain proper records, such as personnel exposure records, leak test records and any training certificates.
4. To ensure equipment use is by authorized individuals only.
5. To ensure equipment is properly secured against authorized removal at all times.
6. To serve as key individual in case of emergency, such as damage in the field or theft, and to report the information to the proper authorities.
7. To post NRC Notice to Employees in a highly visible area.
8. To ensure all users understand safety and emergency procedures.
9. To post "Warning Radioactive Material" on storage area.

II. Operating Procedures.

A. Transportation of Equipment.

1. All possible means shall be provided to ensure that the equipment is fully secured in vehicle away from passenger area. Vehicle will be locked.
2. Gauge will be transported in Troxler case as required by U.S. Department of Transportation.
3. During transport, operator will carry completed Bill of Lading and a copy of current NRC license.

III. Utilization Procedures.

- A. When gauge is in the field, the gauge will always be attended.
- B. When not making measurements, the gauge will be placed in the transportation case and returned to storage area as soon as possible.
- C. When using the equipment, personnel monitoring device will be worn. Monitoring device is to be stored in radiation free area as designated.
- D. A utilization log will be kept to control gauge's location.

IV. Maintenance and Leak Test Procedures.

- A. Periodic maintenance will include cleaning the gauge. Monitoring device will be worn.
- B. No maintenance will be performed in which the radioactive source is removed from the gauge. For this type of maintenance, the gauge will be returned to Troxler.
- C. Leak test will be performed using Troxler Model 3880 Leak Test Kit. Every six months, gauges will be tested according to manufacturer's instructions while wearing personnel monitoring device.
- D. Because the source is not removeable in model 3216 and no periodic maintenance is required, a lead pig is not necessary.

V. Emergency Procedures.

- A. In the event of damage to gauge:
 - 1. Area around gauge will be isolated with a radius of 15 ft.
 - 2. If a vehicle is involved, it must be stopped until contamination can be confirmed.
 - 3. A visual inspection will be made to determine if the source housing and/or shielding has been damaged.
 - 4. As soon as possible, proper authorities will be contacted.
- B. In the event gauge is stolen or lost, proper authorities will be contacted immediately.

TROXLER ELECTRONIC LABORATORIES, INC.

HEREBY CERTIFIES THAT

M. R. CUNNINGHAM

of

COMMERCIAL ROOF MENDERS, INC.

HAS SUCCESSFULLY COMPLETED THE TROXLER ELECTRONIC LABORATORIES, INC.
TRAINING COURSE FOR THE USE OF NUCLEAR TESTING EQUIPMENT.

SUBJECTS INCLUDED IN THIS COURSE WERE AS FOLLOWS:

Radiological Safety

- | | |
|--|---|
| 1. Principles and practices of radiation protection. | 5. Radioactivity measurement standardization and monitoring techniques and instruments. |
| 2. Leak testing procedures. | 6. Accident and incident procedures. |
| 3. Mathematics and calculations basic to the use and measurement of radioactivity. | 7. Procedures for nuclear gauge storage and transportation. |
| 4. Biological effects of radiation. | 8. General safety precautions. |

Gauge Operation

- | | |
|-------------------------|----------------------|
| 1. Instrument theory | 4. Field application |
| 2. Operating procedures | 5. Gauge calibration |
| 3. Maintenance | |

Michael E. Amley
INSTRUCTOR

2/25/85
DATE

W.F. TROXLER
PRESIDENT

No 9703